

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )

v. )

JENNIFER HESS )

Criminal No. 18-142

[UNDER SEAL]

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(E)(i)  
and 846; and 18 U.S.C. §§ 1347 & 2)

INDICTMENT

COUNTS ONE THROUGH FOURTEEN

**FILED**

JUN 05 2018

The grand jury charges:

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

On or about the dates set forth below, in the Western District of Pennsylvania and elsewhere, the defendant, JENNIFER HESS, did knowingly, intentionally and unlawfully aid and abet the distribution by M.B., a physician, of a quantity of buprenorphine, also known as Suboxone, a Schedule III controlled substance, to persons known to the grand jury as "J.C.", "J.M.", "T.F.", "J.K.", "T.C.", "P.D", "P.C.", "B.M.", "L.B.", "A.L.", "C.F.", "M.V.", "E.B." and "J.W.", outside the usual course of professional practice and not for a legitimate medical purpose, each such instance being a separate count of this Indictment.

Count	Date	Person
1	August 17, 2016	J.C.
2	January 18, 2017	C.F.
3	March 1, 2017	M.V.
4	March 1, 2017	E.B.
5	August 16, 2017	J.M.

6	August 16, 2017	T.F.
7	August 16, 2017	J.K.
8	August 16, 2017	T.C.
9	August 16, 2017	P.D.
10	August 16, 2017	P.C.
11	August 16, 2017	B.M.
12	August 16, 2017	L.B.
13	August 16, 2017	A.L.
14	November 29, 2017	J.W.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E)(i),  
and Title 18, United States Code, Section 2.

**COUNTS FIFTEEN THROUGH TWENTY-SEVEN**

The grand jury further charges:

On or about the dates set forth below, in the Western District of Pennsylvania and elsewhere, the defendant, JENNIFER HESS, did knowingly, intentionally and unlawfully aid and abet the distribution by M.A., a physician, of a quantity of buprenorphine, also known as Suboxone, a Schedule III controlled substance, to persons known to the grand jury as "J.K.", "E.A.", "J.C.", "J.R.", "M.R.", "R.R.", "J.R.", "K.R.", "R.J.", "J.T." and "J.H", outside the usual course of professional practice and not for a legitimate medical purpose, each such instance being a separate count of this Indictment.

Count	Date	Person
15	August 1, 2017	J.K.
16	August 1, 2017	R.R.
17	August 1, 2017	K.R.
18	August 1, 2017	R.S.
19	August 1, 2017	J.T.
20	August 1, 2017	J.H.
21	August 29, 2017	J.K.
22	January 2, 2018	E.A.
23	January 2, 2018	J.C.
24	January 2, 2018	J.R.
25	January 2, 2018	M.R.
26	January 2, 2018	R.R.
27	January 2, 2018	J.R.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E)(i),  
and Title 18, United States Code, Section 2.

**COUNTS TWENTY-EIGHT THROUGH THIRTY-FOUR**

The grand jury further charges:

On or about the dates set forth below, in the Western District of Pennsylvania and elsewhere, the defendant, JENNIFER HESS, did knowingly, intentionally and unlawfully aid and abet the distribution by K.A., a physician, of a quantity of buprenorphine, also known as Suboxone, a Schedule III controlled substance, to persons known to the grand jury as “B.O.”, “S.C.”, “J.P.”, “D.S.”, “J.B”, “P.N.” and “L.D.”, outside the usual course of professional practice and not for a legitimate medical purpose, each such instance being a separate count of this Indictment.

Count	Date	Person
28	July 30, 2015	B.O.
29	July 30, 2015	S.C.
30	July 14, 2016	J.P.
31	December 29, 2016	D.S.
32	June 22, 2017	J.B.
33	August 3, 2017	P.N.
34	December 28, 2017	L.D.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E)(i), and Title 18, United States Code, Section 2.

**COUNTS THIRTY-FIVE THROUGH THIRTY-NINE**

The grand jury further charges:

On or about the dates set forth below, in the Western District of Pennsylvania and elsewhere, the defendant, JENNIFER HESS, did knowingly, intentionally and unlawfully aid and abet the distribution by C.J., a physician, of a quantity of buprenorphine, also known as Suboxone, a Schedule III controlled substance, to persons known to the grand jury as “P.E.”, “S.H.”, “A.M.”, “J.B.” and “D.C.”, outside the usual course of professional practice and not for a legitimate medical purpose, each such instance being a separate count of this Indictment.

Count	Date	Person
35	December 29, 2014	P.E.
36	January 19, 2017	S.H.
37	July 27, 2017	A M.
38	July 27, 2017	J.B.
39	July 27, 2017	D.C.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E)(i), and Title 18, United States Code, Section 2.

**COUNTS FORTY THROUGH FORTY-FIVE**

The grand jury further charges:

On or about the dates set forth below, in the Western District of Pennsylvania and elsewhere, the defendant, JENNIFER HESS, did knowingly, intentionally and unlawfully aid and abet the distribution by P.B., a physician, of a quantity of buprenorphine, also known as Suboxone, a Schedule III controlled substance, to persons known to the grand jury as "N.S.", "D.S.", "B.R.", "Z.M." and "T.S.", outside the usual course of professional practice and not for a legitimate medical purpose, each such instance being a separate count of this Indictment.

Count	Date	Person
40	November 3, 2015	N.S.
41	January 12, 2016	D.S.
42	April 5, 2016	B.R.
43	August 23, 2016	Z.M.
44	October 3, 2017	T.S.
45	October 17, 2017	T.S.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E)(i), and Title 18, United States Code, Section 2.

**COUNT FORTY-SIX**

The grand jury further charges:

From in and around January 2014, and continuing thereafter to in and around January 2018, in the Western District of Pennsylvania, and in the Northern District of West Virginia, defendant JENNIFER HESS did knowingly, intentionally and unlawfully conspire with persons known and unknown to the grand jury to distribute a quantity of buprenorphine, also known as Suboxone or Subutex, a Schedule III controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E)(i).

In violation of Title 21, United States Code, Section 846.



**COUNT FORTY-SEVEN**

The grand jury further charges:

1. At all times material to this Indictment:

a. The Centers for Medicare and Medicaid Services, also known as CMS, was a federal agency with the United States Department of Health and Human Services, which administered the Medicaid program.

b. Medicaid was a health care benefit program, as defined in Title 18, United States Code, Section 24(b), which provided medical assistance and related services to needy individuals. CMS administered the Medicaid program at the federal level, and the Pennsylvania Department of Public Welfare (PDPW), also known as the Pennsylvania Department of Human Services, processed Medicaid claims submitted for various services for beneficiaries in Pennsylvania.

c. Medicare was a health care benefit program, as defined in Title 18 United States Code, Section 24(b), which provided medical assistance and related services to qualified individuals.

d. Redirections Treatment Advocates, LLC, (RTA), was an opioid treatment practice, located at 382 West Chestnut Street, Suite 107, Washington, PA 15301.

e. Defendant JENNIFER HESS was the owner of RTA.

f. Individuals known to the grand jury as M.B., M.A., K. A., C. J. and P. B. were independent contractors at RTA and prescribing physicians at RTA's Washington and Bridgeville, Pennsylvania locations and Morgantown and Weirton, West Virginia locations.

g. M.B., M.A., K.A., C.J. and P.B. were registered with the Drug Enforcement Administration (DEA) as a practitioners authorized by the Drug Addiction Treatment Act of 2000 (DATA) Waived Physician practice to treat opioid addicted patients and approved to treat up to 100 patients.

h. In order for the State of Pennsylvania Medicaid program and the Medicare program to pay for buprenorphine, Subutex, Suboxone and other opioid treatment medications, a valid prescription must be filled out and signed by a DATA waived physician in the usual course of professional practice and for a legitimate medical purpose.

#### The Scheme to Defraud

2. From in and around January 2014, and continuing thereafter until in and around January 2018, in the Western District of Pennsylvania and elsewhere, defendant JENNIFER HESS along with others known and unknown to the grand jury perpetrated a scheme to defraud and to cause prescriptions to be paid by the Medicaid program and the Medicare program, by means of materially false and fraudulent representations, pretenses and promises, in connection with the delivery of and payment for health care services, which scheme is further described below.

3. It was part of the scheme to defraud that the defendant and others known to the grand jury collected and caused to be collected from M.B., M.A., K.A., C. J. and/or P.B., blank pre-signed prescriptions.

4. It was further a part of the scheme to defraud that the defendant and others known to the grand jury paid the said doctors for their blank pre-signed prescriptions.

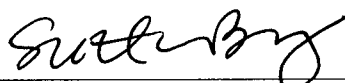
5. It was further a part of the scheme to defraud that the defendant and others known to the grand jury completed and caused to be completed the said blank pre-signed

prescriptions by writing on them the date, name of the patient, the drug, and the drug quantity. Thereafter, the presentation of these prescriptions to pharmacies caused the Medicaid program and the Medicare program to pay for these prescriptions.

All in violation of Title 18, United States Code, Sections 1347 and 2.

A True Bill,

  
FOREPERSON

  
SCOTT W. BRADY  
United States Attorney  
PA ID No. 88352